

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**FREE SPEECH SYSTEMS, LLC,**

**Debtor.**

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§  
§

**Case No. 22–60043**

**Chapter 11  
Subchapter V**

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**THE TEXAS PLAINTIFFS’ NOTICE OF DEPOSITION TO PQPR HOLDINGS  
LIMITED, LLC PURSUANT TO FED. R. CIV. P. 30(B)(6)**

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**TO: PQPR Holdings Limited, LLC  
2621 Ridgepoint Drive  
Austin, TX 78754**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, applicable to this proceeding under Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, and Marcel Fontaine (“**Texas Plaintiffs**”) will conduct the oral deposition of one or more officers, directors, agents or other representatives of PQPR Holdings Limited, LLC (“**PQPR**”) on **October 4, 2022 at 10:00 a.m.**, prevailing central time, at the law offices of Akin, Gump, Strauss, Hauer & Feld, LLP, 1111 Louisiana St., 44<sup>th</sup> Floor, Houston, TX 77002. PQPR shall produce one or more officers, directors, agents or representatives most knowledgeable and prepared to testify regarding the topics described in **Exhibit A**. The Texas Plaintiffs request that PQPR provide written notice at least five (5) business days before the deposition of the name(s) and employment position(s) of the individual(s) designated to testify on PQPR’s behalf.

The deposition shall be taken before a person duly authorized by law to administer oaths, and may be recorded by stenographic, audiographic, and/or videotaped means. The deposition shall continue from day to day thereafter or as otherwise agreed by the parties, until completed.

Dated: September 16, 2022

Respectfully submitted,

**MCDOWELL HETHERINGTON LLP**

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***Counsel for the Texas Plaintiffs***

and

**CHAMBERLAIN, HRDLICKA, WHITE,  
WILLIAMS & AUGHTRY, P.C.**

By: /s/ Jarrod B. Martin  
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***Bankruptcy Counsel for Texas Plaintiffs***

**CERTIFICATE OF SERVICE**

This will certify that on September 16, 2022, a true and correct copy of the foregoing document was served via electronic transmission to all registered ECF users appearing in the case and will be sent via first-class, postage prepaid, United States mail on September 19, 2022 as follows:

PQPR Holdings Limited, LLC  
2621 Ridgpoint Drive  
Austin, TX 78754

Stephen W. Lemmon  
Streusand, Landon, Ozburn & Lemmon, LLP  
1801 S. MoPac Expressway  
Suite 320  
Austin, Texas 78746

/s/ Jarrod B. Martin  
Jarrod B. Martin

**EXHIBIT A**

In accordance with Fed. R. Civ. P. 30(b)(6), Texas Plaintiffs designate the matters identified below for examination.

1. Payments to Alex Jones (directly or indirectly through entities he controls or has an ownership interest in) since PQPR's inception.
2. Payments to David Jones (directly or indirectly through entities he controls or has an ownership interest in) since PQPR's inception.
3. Payments to Carol Jones (directly or indirectly through entities she controls or has an ownership interest in) since PQPR's inception.
4. Communications and documents PQPR exchanged with Blue Asension.
5. PQPR's communications and documents about its product-fulfillment services or the product fulfillment of Free Speech Systems, LLC ("FSS").
6. Communications and documents exchanged with FSS regarding any debts, agreements, contracts, promissory notes, invoices, product orders, product sales, and forbearance agreements—including any negotiations regarding these items.
7. Communications between W. Marc Schwartz and PQPR relating to FSS's alleged debt to PQPR.
8. The item pertaining to PQPR budgeted for in FSS's proposed 13-week budget in support of its cash-collateral motion.
9. Documents and communications exchanged with FSS regarding FSS's petition for bankruptcy.
10. Internal documents and communications regarding FSS's petition for bankruptcy.
11. Communications and documents produced by PQPR in response to discovery requests in this bankruptcy.
12. Communications and documents exchanged between PQRP and Alex Jones regarding Jones's compensation (including draws, salary, and any other compensation).
13. Communications and documents exchanged between PQPR and David Jones since January 1, 2018.
14. Communications and documents exchanged between PQPR and Carol Jones since January 1, 2018.

15. PQPR's accounting and bookkeeping since January 1, 2012—including (i) who was responsible for or helped with its accounting and bookkeeping; (ii) what systems and software were used for accounting and bookkeeping; and (iii) how accounting and bookkeeping records were created and kept in the ordinary course of business.

16. All employees of PQPR since January 1, 2012.

17. The offices and facilities PQPR owns, leases, or operates since January 1, 2012.

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